application software other than simply transcribing text, such as opening a file, deleting text, or repositioning an active window. <u>The command component is specified within a command grammar.</u> By comparison, the dictation component can include words which are to be converted to text for use within an electronic document. <u>Unlike the command component, however, the dictation component is freely dictated text that is not defined within the command grammar.</u>

For example, the present invention can process a contiguous utterance such as "load all files regarding first quarter results". Within this voice command, the text "load all files regarding" can be specified within a command grammar. Accordingly, this portion of the contiguous utterance can be recognized as part of the voice command component. <u>The dictated text "first quarter results", which is not defined within the command grammar, can be identified as the dictation component.</u> Based upon the identified voice command and dictation components, an application command having a parameter can be determined. For example, "load all files regarding first quarter results" can be translated into "loadfiles(<text>)", wherein the parameter <text> can include the portion of text extracted from the dictation component, i.e. "first quarter results". The command then can be provided to an application program for execution. Thus, the present invention can process single voice commands within a contiguous utterance having a freely dictated text component embedded therein.

Turning now to the rejections on the art, claims 22-31 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Gould. Gould teaches a method of distinguishing commands from dictated text within speech so that a user need not switch between a command mode and a dictation mode. Gould can distinguish between commands and dictated text by defining predetermined commands and detecting those commands within user speech. Additionally, Gould detects characteristics such as pauses between the commands and the dictated text in the user speech to define where a command ends and where the dictated text begins. The dictated text in the Gould invention, however, is not part of a voice command. Rather, the dictated text is independent text to be transcribed. Gould recognizes only speech

commands which correspond to a pre-determined template. In other words, the speech commands recognized by Gould must be fully specified, i.e. defined within a given vocabulary or a grammar.

Gould does not disclose identifying a voice command having a voice command component and a dictation component as recited in Applicants' pending claims. Gould merely distinguishes between dictated text and speech commands by detecting a pause between the speech commands and the dictated text. As such, the speech commands recognized by Gould do not include a dictation component. Rather, Gould recognizes speech commands and dictated text separately.

Assuming arguendo, however, that Gould does recognize a voice command having a voice command component and a dictation component, Gould does not identify such a voice command within a contiguous utterance. In column 2, lines 46-56 of the Gould specification, it is stated that:

> The system recognizes both continuously spoken commands and
> continuously dictated text by taking advantage of characteristics common
> to the natural speech of most users. For instance, users typically pause
> (e.g., 0.5 sec) before and after speaking a command. Similarly, following
> a pause, users begin commands by speaking action verbs (e.g.,
> underline, bold, delete) and begin dictated text by speaking nouns. To
> take advantage of these and other characteristics, <u>the system expects the
> user to pause before and after speaking a command and to follow a
> particular structure or template when speaking a command.</u>

(emphasis added) Thus, Gould requires a pause between a command and dictated text. The literal language of the Applicants' claims, however, specifies that the command component and the dictation component are identified <u>within a contiguous utterance.</u> Accordingly, Gould does not teach identifying a voice command having a voice command component and a dictation component within a contiguous utterance.

Gould further does not disclose identifying a voice command component and a dictation component within a contiguous utterance<u>, wherein the voice command component is specified by a command grammar and the dictation component is not</u>
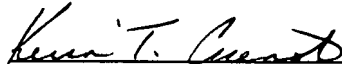
<u>specified by the command grammar.</u> Rather, as stated in the Gould specification "the system expects . . . to follow a particular structure or template when speaking a command." Gould teaches that command sentences defined by templates can be recognized. The command sentences begin with fixed words and can specify a <u>variable, which also must be defined within a cross vocabulary or sub-grammar.</u> Thus, Gould's reference to "text objects" in column 5, lines 13-30 does not refer to recognizing a dictation component – that is text which is not specified by the command grammar. Instead, Gould teaches that a command such as "underline <text object>" can be recognized, wherein the sub-grammar "text object" defines all allowable words such as "characters", "words", "lines", "sentences", or "paragraphs". Thus, Gould recognizes only commands which are completely specified within defined templates (command grammars). Gould does not identify a voice command having a dictation component which is not specified by a command grammar.

Finally, Gould does not disclose executing a voice command wherein at least a portion of a dictation component is used as an execution parameter. Gould merely recognizes speech commands which are completely specified within one or more cross vocabularies and distinguishes those commands from dictated text. Because Gould does not identify a voice command having a dictation component, it logically follows that Gould cannot execute a voice command wherein at least a portion of the dictation component is an execution parameter.

In view of the foregoing, withdrawal of the 35 U.S.C. § 102(e) rejection is respectfully requested. The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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